

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

**FILED
HARRISBURG, PA**

EPSILON ENERGY USA, INC.,

Plaintiff,

v.

Civil Action No. 1:21-cv-00658

CHESAPEAKE APPALACHIA, LLC,

Defendant.

PER TBA
DEPUTY CLERK

District Court Judge Wilson

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiff Epsilon Energy USA, Inc. (“Epsilon”), by and through its undersigned counsel, and pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, hereby respectfully moves this Court for leave to file the Amended Complaint attached hereto as Exhibit A for the reasons set forth in Epsilon’s accompanying Memorandum of Law, which is being filed simultaneously herewith and is fully incorporated by reference herein.

Dated: June 1, 2021

Respectfully submitted,

/s/ Gregory J. Krock

Gregory J. Krock
Pa. I.D. No. 78308
Elizabeth M. Thomas
Pa. I.D. No. 322002

MCGUIREWOODS LLP
Tower Two-Sixty

260 Forbes Avenue, Suite 1800
Pittsburgh, PA 15222-3142
(412) 667-6000 (Telephone)
(412) 667-6050 (Facsimile)
gkrock@mcguirewoods.com
ethomas@mcguirewoods.com

Jonathan T. Blank
Admitted Pro Hac Vice
MCGUIREWOODS LLP
652 Peter Jefferson Parkway
Suite 350
Charlottesville, VA 22911
(434) 977-2500 (Telephone)
(434) 980-2222 (Facsimile)
jblank@mcguirewoods.com

Yasser A. Madriz
(admitted Pro Hac Vice)
JPMorgan Chase Tower
600 Travis Street
Suite 7500
Houston, TX 77002-2906
(832) 255 6361 (Telephone)
(832) 214 9931 (Facsimile)
ymadriz@mcguirewoods.com

*Counsel for Plaintiff Epsilon Energy USA,
Inc.*

LOCAL RULE 7.1(a)(1)(A) MEET AND CONFER STATEMENT

I, Gregory J. Krock, representing Epsilon Energy USA, Inc. (“Epsilon”) hereby certifies that pursuant to Local Rule 7.1(a)(1)(A), counsel for Epsilon has conferred with counsel representing Defendant Chesapeake Appalachia, L.L.C. (“CHK”) regarding the subject of the present Motion for Leave to file Amended Complaint on May 24, 2021, May 26, 2021, and May 28, 2021. CHK opposes the Motion and counsel for CHK and counsel for Epsilon were unable to agree to the resolution of all or part of the present Motion.

Dated: June 1, 2021

Respectfully submitted,

/s/ Gregory J. Krock

Gregory J. Krock

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2021, a copy of the foregoing document was electronically filed with the Court's electronic filing system, which will provide notice of the same to all parties indicated on the electronic filing receipt.

/s/ *Gregory J. Krock*